

RCRA/ACT 64 INSPECTION REPORT

U.S. EPA I.D. Number M I D 0 2 0 9 0 6 7 6 4
(or Michigan)FACILITY NAME
(Mailing Address)DETREX CHEMICAL INDUSTRIES312 ELLSWORTH ST.GRAND RAPIDS
CITYMICHIGAN 49503
ZIP CODEDATE 2/9/90 TIME OF INSPECTION (FROM) 8:30 (TO) 11:15

PERSON(S) INTERVIEWED	TITLE	TELEPHONE
<u>S HARON BURNS</u>	<u>FACILITY Mgr</u>	<u>454-9269</u>

INSPECTOR(S)	AGENCY/TITLE	TELEPHONE
<u>Dale DeKroger</u>	<u>MDNR</u>	<u>456-5071</u>

Primary Business of this Facility:

DISTRIBUTES RAW SOLVENTS AND HAULSSOLVENT WASTES

Reason for Inspection:

☒ Routine☐ Follow-up☐ Complaint

Based upon the inspection, this facility:

- ☐ is a non-generator/liquid industrial waste generator
☐ conditionally exempt small quantity generator
☐ small quantity generator
☒ generator
☒ transporter
☒ treatment/storage/disposal facility

FORM

A
A
A
B
C
DDate of Last Inspection 3-23-89

US EPA RECORDS CENTER REGION 5



429026

RCRA/ACT 64 INSPECTION REPORT

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✓ generator
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INSPECTION FORM D
Part 6 of Rules
P.A. 64 of 1979

TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:

- ☒ Generates Hazardous Waste (Also use Generator Appendix)
- ☐ Treats Hazardous Waste
- ☒ Stores Hazardous Waste
- ☐ Disposes of Hazardous Waste
- ☒ Transports Hazardous Waste (Also use Form C)

This Facility:

- ☒ Accepts wastes from off-site sources
- ☐ Handles only its own wastes

If applicable, hazardous waste is stored in the following:

- ☒ Drums (Containers)
- ☐ Above-ground tanks
- ☐ Underground tanks
- ☐ Waste piles
- ☐ Lagoons
- ☐ Other
- ☐ Not applicable

If applicable, hazardous wastes are treated/disposed in the following:
(Attach appropriate checklist)

- ☐ Surface Impoundments
- ☐ Waste piles
- ☐ Land Treatment
- ☐ Landfills
- ☐ Incineration/Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Above-ground tanks

INSPECTION D

☐ Underground tanks
☐ Drums
☐ Other
☐ Not applicable

WASTE STREAMS

Hazardous Waste Code/Name	Source	Type of Storage	How Much
FOU1	Various Generators	Drum	60/mo.)
FOO2	" "	"	

INSPECTION FORM D
Part 6 Rules
P.A. 64 of 1979

HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY
Applies to Those Facilities That Do Not Have an Act 64 Permit

General Facility Standards

Rule 601, 40 CFR 265, Subpart B

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
1. <u>If required</u> , have the following been notified:				
a.) Notified Director of receipt of hazardous waste from a foreign source? 265.12(a)	—	—	✓	II
b.) Notified Director of change of owner or operator. 40 CFR Part 270. 265.12(b)	—	—	✓	II

Comments:

NO FOREIGN WASTES RECEIVED

NO CHANGES IN OWNERSHIP

2. General Waste Analysis: 265.13

a.) Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	✓	—	—	I
b.) Does the owner or operator have a detailed waste analysis plan on file at the facility? 265.13(b)	✓	—	—	I
c.) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)	✓	—	—	I

Comments:

Incorporated into license application. Good plan

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

3. Security - If applicable, do security measures include:

- | | | | | |
|---|-------------------------------------|--|-------------------------------------|---|
| a.) 24-hour surveillance? 265.14(b)(1) | | | <input checked="" type="checkbox"/> | I |
| or | | | | I |
| b.) i. Artificial or natural barrier around facility? 265.14(b)(2)(i) | <input checked="" type="checkbox"/> | | | |
| and | | | | |
| ii. Controlled entry? 265.14(b)(2)(ii) | <input checked="" type="checkbox"/> | | | I |
| c.) Danger sign(s) at entrance? 265.14(c) | <input checked="" type="checkbox"/> | | | I |

Comments:

8 hours per day - locked on weekends
and at night. Operation is all indoor.

4. Owner or operator inspections: 265.15*

- | | | | | |
|--|-------------------------------------|--|-------------------------------------|----|
| a.) Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? 265.15(a) | <input checked="" type="checkbox"/> | | | II |
| b.) Does the owner or operator have a written inspection schedule at the facility? 265.15(b)(1) | <input checked="" type="checkbox"/> | | | II |
| c.) If so, does the schedule address the inspection of the following items: | | | | |
| i. Monitoring equipment? 265.15(b)(1) | | | <input checked="" type="checkbox"/> | II |
| ii. Safety and emergency equipment? | <input checked="" type="checkbox"/> | | | II |
| iii. Security devices? 265.15(b)(1) | <input checked="" type="checkbox"/> | | | II |
| iv. Operating and structural equipment (i.e. dikes, pumps, etc.)? 265.15(b)(1) | <input checked="" type="checkbox"/> | | | II |

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

INSPECTION FORM D

Violation
ClassYesNoN/A

v.	Type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>✓</u>	<u>—</u>	<u>—</u>	II
vi.	inspection frequency (based upon the possible deterioration rate of the equipment)? 265.15(b)(4)	<u>✓</u>	<u>—</u>	<u>—</u>	II
d.)	Are areas subject to spills inspected daily when in use? 265.15(b)(4)	<u>✓</u>	<u>—</u>	<u>—</u>	II
e.)	Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>✓</u>	<u>—</u>	<u>—</u>	II
f.)	Does the inspection log contain the following information: 265.15(d)				
i.	The date and time of the inspection? 265.15(d)	<u>✓</u>	<u>—</u>	<u>—</u>	II
ii.	The name of the inspector? 265.15(d)	<u>✓</u>	<u>—</u>	<u>—</u>	II
iii.	A notation of the observations made? 265.15(d)	<u>✓</u>	<u>—</u>	<u>—</u>	II
iv.	The date and nature of any repairs or remedial actions? 265.15(d)	<u>✓</u>	<u>—</u>	<u>—</u>	II

Comments:

Daily and Weekly inspections
well written plan and well
kept logs.

5. Do personnel training records include:
265.16

a.)	Job titles? 265.16(d)(1)	<u>✓</u>	<u>—</u>	<u>—</u>	I
b.)	Job descriptions? 265(d)(2)	<u>✓</u>	<u>—</u>	<u>—</u>	I
c.)	Description of training? 265.16(d)(3)	<u>✓</u>	<u>—</u>	<u>—</u>	I

INSPECTION FORM D

Violation
Class

Yes

No

N/A

Class

- d.) Records of training?
265.16(d)(4)

✓

—

—

II

- e.) Do new personnel receive re-
quired training within six
months? 265.16(d)

✓

—

—

I

- f.) Do personnel training records
indicate that personnel have
taken part in an annual review
of training? 264.16(c)

✓

—

—

I

Comments: _____

Test performed in June, 1989

6. If required, are the following special
requirements for ignitable, reactive, or
incompatible wastes addresses?
265.17

—

—

✓

I

- a.) Special handling? 265.17(a)

—

—

✓

I

- b.) No smoking signs? 265.17(a)

—

—

✓

I

- c.) Separation and protection from
ignition sources? 265.17(a)

—

—

✓

I

Comments: _____

Wastes are not ignitable or reactive.

PREPAREDNESS AND PREVENTION
Rule 606, 40 CFR 265, Subpart C

1. Is there any evidence of fire, explosion,
or release of hazardous waste or hazard-
ous waste constituents 40 CFR Rule 265.31

✓

✓

—

I

Comments: *No evidence of recent leaks, however, soil contamination
is known to exist outside of facility. Will be addressed
under closure plan and RCRA part B.*

INSPECTION FORM D

Violation
Class

Yes No N/A

2. If required, does this facility have the following equipment: 40 CFR 265.32

- | | | | | | |
|--|----------|-----------|-----------|-----------|-------------------|
| a.) Internal communications or alarm systems. 40 CFR 265.32(a) | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | I |
| b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b) | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | I |
| c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c) | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | I |
| d.) Indicate the volume of water and/or foam available for fire control. | | | | | <u>City Water</u> |

Comments: _____

Telephone / P.A. system - Mart
communication by voice due to small size of
facility.

3. Testing and Maintenance of Emergency Equipment: 265.33

- | | | | | | |
|---|----------|-----------|-----------|-----------|---|
| a.) Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33 | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | |
| b.) Is emergency equipment maintained in operable condition? 265.33 | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | |
| c.) <u>If required</u> , has owner or operator provided immediate access to internal alarms? 40CFR 265.34(a) | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | |
| d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment. 40 CFR 265.35. | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> | I |

INSPECTION FORM D

Yes	No	N/A	Violation Class
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Comments: _____

Equipment is tested quarterly
Circle space much improved over previous
years.

4. Has the owner or operator attempted to make arrangements with local authorities in case of emergencies. 40 CFR 265.37

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
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Comments: _____

Letters are on file.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Rule 607, 40 CFR 265 Subpart D.

1. Does the contingency plan contain the following information:

- a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (As applicable). 265.52(a)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

- b.) Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

- c.) Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

INSPECTION FORM D

Violation
ClassYesNoN/AClass

- | | | | | | |
|-----|--|-------------|-------------|-------------|-----------|
| d.) | A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e) | <u>✓</u> | <u> </u> | <u> </u> | <u>II</u> |
| e.) | An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f) | <u>✓</u> | <u> </u> | <u> </u> | <u>II</u> |
| f.) | Is the facility emergency coordinator identified. 40 CFR 265.55 | <u>✓</u> | <u> </u> | <u> </u> | <u>II</u> |
| g.) | Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55 | <u>✓</u> | <u> </u> | <u> </u> | <u>II</u> |
| h.) | Does the Emergency Coordinator have the authority to carry out the Contingency Plan. 40 CFR 265.55 | <u>✓</u> | <u> </u> | <u> </u> | <u>II</u> |
| i.) | If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56. | <u> </u> | <u> </u> | <u>✓</u> | <u>I</u> |
| j.) | Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinators, changes in emergency equipment. 40 CFR 265.54 | <u>✓</u> | <u> </u> | <u> </u> | <u>II</u> |

Comments:

Plan amended in 1988 - No emergencies have
ever occurred.

INSPECTION FORM D

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
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2. Are copies of the contingency plan available at site and local emergency organizations. 40 CFR 255.53(a) 254.53(b)

II

Comments:

New plan should be distributed

USE OF MANIFEST SYSTEM

Rule 601(2)(b)

1. Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following:

- a.) Are copies signed and dated.

I

Rule 608(1)(a)

- b.) Are significant discrepancies noted on the manifest.

I

Rule 608(1)(b)

- c.) Are transporters given 1 copy of the signed manifest.

I

Rule 608(1)(c)

- d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)

I

- e.) Are copies of the manifest retained for 3 years.

I

- f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608(1)(f)

II

Comments:

Detox in the transporter and the TSD.

INSPECTION FORM D

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
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2. Does this facility ship hazardous waste off-site. If yes, complete Generator Appendix. Rule 608(3)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
-------------------------------------	--------------------------	--------------------------	-----

Comments: _____

see attached appendix

3. For unreconciled significant discrepancies in manifests has the Director been notified. Rule 608(4)

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I
--------------------------	--------------------------	-------------------------------------	---

Comments: _____

No discrepancies have ever occurred.

RECORDKEEPING

Rule 601(3) 40 CFR 265. Subpart E

1. Does the owner or operator of this facility maintain an operating record? Rule 609(1)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
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Comments: _____

Drum receiving and shipping log forms a basic but good operating record.

2. Does this operating record contain: 265.73

- a.) The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265.73(b)(1) Appendix E

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
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INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 265.73(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
c.) If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
d.) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
f.) Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) <u>If required</u> , monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
h.) Closure and post closure cost estimates. 265.73(b)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II

Comments:

Items exist but under separate covers.

3. Are all required records available and maintained for at least 3 years.
265.74(3)

☒ ☐ ☐ ☐ II

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

Comments: _____

REPORTING

1. Has the owner or operator submitted a biennial report to the required administration by March 1 of even numbered years? 265.75

II

Comments: Submitted 5-24-88. Company to check on receipt of 1989 report.

2. If applicable, for TSD's that receive hazardous waste from off-site sources. Rule 265.76

I

- a.) Has the facility accepted any hazardous waste from an off-site generator subject to Rule 205 without a manifest or shipping paper?

I

- b.) If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

I

USE AND MANAGEMENT OF CONTAINERS

Drums/Roll-off Boxes/Gondolas

1. Is hazardous waste accumulated in containers? If no, skip to tank section.

N/A

2. a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c)? If no, how many

I

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____. Accumulation dates _____.	_____	_____	✓	I
c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many _____.	✓	_____	_____	I
d.) Are containers in good condition Rule 306(1)(a), 40 CFR 265.171. If no, specifically what is their conditions. _____	✓	_____	_____	I
e.) Are containers compatible with waste in them. RULE 306(1)(a) 40 CFR 265.172. If no, explain _____	✓	_____	_____	I
f.) Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a) If no, how many _____.	✓	_____	_____	I
g.) Are containers managed to prevent leaks? Rule 306(1)(a), 40 CFR 265.173(b) If no, explain _____	✓	_____	_____	I
h.) Are containers inspected weekly for leaks and defects? Rule 306(1)(a) 40 CFR 265.174.	✓	_____	_____	I
i.) Are ignitable and reactive wastes stored at least 15 meters (50 Feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	_____	_____	✓	I
j.) Are incompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	_____	_____	✓	I

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

- k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.

		✓	I
--	--	---	---

Comments: Drums are labeled and dated by generator prior to shipping to Detox.

3. If storing free liquid, does hazardous waste storage area include: rule 306(1)(a) 40 CFR 264.175.

- a.) Impervious base free of cracks. 40 CFR 264.175(b)(1)

✓			I
---	--	--	---

- b.) Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.

✓			I
---	--	--	---

Comments:

Facility depends on the basement to contain any leakage.

from drums located on the main floor. Doors are all curved to prevent losses.

4. Is hazardous waste being accumulated at the point of generation, Rule 306(2)

	✓		N/A
--	---	--	-----

If yes:

- a.) Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)

			I
--	--	--	---

- b.) Is container under control or operator and near point of generation and under control of operator? Rule 306(2)

			I
--	--	--	---

- c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171

			I
--	--	--	---

INSPECTION FORM D

Violation

	Yes	No	N/A	Class
--	-----	----	-----	-------

d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172

I

e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173

I

f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents) Rule 306(2)

I

Comments:

TANKS

1. Is hazardous waste accumulated in tanks?
If no, skip to c.

N/A

a.) Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)

I

b.) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).

I

c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. Rule 306(1)(a), 40 CFR 265.192(c)?

I

d.) Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).

I

e.) Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194?

II

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

- f.) Are reactive and ignitable wastes in tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23 Rule 306(1)(a), 40 CFR 265.199

II

- g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.

I

- h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)

I

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(See tables 2-1 through 206 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments: _____

2. Do above ground tanks have a 150% containment area constructed of impervious material, or if tanks hold incompatible wastes is each tank structurally enclosed? Rule 615(3)

I

INSPECTION FORM D

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
------------	-----------	------------	------------------------

Comments: _____

3. Do owners and operators of underground tanks do all the following:

a.) Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)	_____	_____	_____	I
b.) Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)	_____	_____	_____	I
c.) Conduct leachate sampling at least once a year. Rule 615(4)(c)	_____	_____	_____	I
d.) Maintain an accurate inventory of the tank. Rule 615(4)(d)	_____	_____	_____	I

Comments: _____

4. Is hazardous waste accumulated in other than tanks or containers?
If yes, explain _____

_____	✓	_____	N/A
-------	---	-------	-----

Comments: _____

INSPECTION FORM D

CLOSURE AND POST CLOSURE (Part 265 Subpart G)
 Part 7 of Act 64 Rules

	Yes	No	N/A	Violation Class
1. Closure 265.112				
a.) Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Does the plan identify				
i. maximum extent unclosed during facility life?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
iii. estimated year of closure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
iv. schedule of closure activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

Closure plan dated June, 1989. Currently under review. Company should get latest plan on-site along with latest financial statements.

*2. Post-Closure 265.118 - Act 64 Rules

a.) Is the post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I
b.) Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
ii. description of maintenance activities and frequencies for				
AA. integrity of cap. final cover, or containment structures, where applicable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
BB. facility monitoring equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
iii. name, address, and phone number of person or office to contact during post- closure care period?	_____	_____	_____	I _____
c.) Has the post-closure period begun?	_____	_____	_____	N/A _____
d.) Is the written post-closure cost estimate available? 255.144	_____	_____	_____	I _____

Comments: _____

* Applies only to disposal facilities.

	Yes	No	N/A	Violation Class
--	-----	----	-----	--------------------

GENERATOR APPENDIX

Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements

- | | | | | | |
|----|---|----------|-------------|--------------|----|
| 1. | a.) Does the generator have copies of the manifest available for review and on-site. 262.40 | <u>✓</u> | <u> </u> | <u> </u> | II |
| | b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. | | | <u>15-20</u> | |

Comments: Most sent to Detroit or to Ashland, Ohio.
Detroit hauls its own waste

2. Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements:

- | | | | | |
|---|----------|-------------|-------------|----|
| a.) Manifest document number (Rule 304(2)(a)? | <u>✓</u> | <u> </u> | <u> </u> | II |
| b.) The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b) | <u>✓</u> | <u> </u> | <u> </u> | II |
| c.) The name and EPA ID number of transporter. Rule 304(2)(c) | <u>✓</u> | <u> </u> | <u> </u> | II |
| d.) Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d) | <u>✓</u> | <u> </u> | <u> </u> | II |
| e.) The description of waste(s) (DOT shipping name, DOT hazard class, DOT identification number. Rule 304(2)(e) | <u>✓</u> | <u> </u> | <u> </u> | II |

GENERATOR APPENDIX

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
f.) The total quantity of waste(s) and the type and number of containers loaded. Rule 304(l)(f)	<u>✓</u>	<u> </u>	<u> </u>	II
g.) Hazardous waste number describing the wastes. Rule 304(l)(g)	<u>✓</u>	<u> </u>	<u> </u>	II
h.) Certification as required in Rule 304(l)(h)	<u>✓</u>	<u> </u>	<u> </u>	II
i.) Signatures as required in Rule 304(4)	<u>✓</u>	<u> </u>	<u> </u>	I
j.) Waste minimization program/certification	<u>✓</u>	<u> </u>	<u> </u>	I

Comments: _____

3. Reportable exceptions. Rule 308(3), 40 CFR 262.42

a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>	<u>✓</u>	<u> </u>	<u> </u>	I
b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>	<u>✓</u>	<u> </u>	<u> </u>	

Comments: _____

TRANSPORTER OF HAZARDOUS WASTE

Facility Name Detroit Corporation

	Yes	No	N/A	Violation Class
1. If contract hauler, does this transporter have a business license? Rule 403(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
2. Does this transporter have authority to mix, combine or commingle? Rule 405(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
a.) Do they comply with special conditions attached to their license?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Does transporter comply with generator requirements. Rule 405(2) (use generator checklist)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments Business license in Detroit

3. Is this transporter authorized to operate a transfer facility as stipulated in the transporter license. Rule 404(1).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
a.) If yes, does transporter comply with provisions of 40 CFR 265 Part I and 40 CFR 264.175 including containment, management of containers and inspections? Rule 404(3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments Transfer facility is a possibility in the near future.

Form C
Transporter of Hazardous Waste

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
4. Is there evidence that hazardous wastes/constituents have been released or escaped at the facility? Rule 407(a)	<u> </u>	<u> ✓ </u>	<u> </u>	<u>N/A</u>

Comments _____

5. If vehicles are cleaned on site. are proper procedures followed including testing and disposal of wastewater. Rule 407(b)	<u> </u>	<u> </u>	<u> ✓ </u>	<u>N/A</u>
--	---------------	---------------	--------------	------------

Comments Vehicles are not washed on-site

6. Are facilities constructed so as to minimize release of hazardous wastes. Rule 407(c)	<u> ✓ </u>	<u> </u>	<u> </u>	<u>N/A</u>
--	--------------	---------------	---------------	------------

Comments _____

MANIFEST SYSTEM AND RECORDKEEPING

7. Are copies of completed manifests available for review and retained for three years? Rule 409(1), 40 CFR 263.22(a)	<u> ✓ </u>	<u> </u>	<u> </u>	<u>I</u>
---	--------------	---------------	---------------	----------

Comments _____

8. Indicate the number of manifests examined ~100

Comments From various generators.

Form C
Transporter of Hazardous Waste

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
9. Has this transporter experienced a discharge, loss or spill of hazardous wastes during transportation? Rule 410	<u> </u>	<u>✓</u>	<u> </u>	<u>N/A</u>
If yes, was the following done:				
a.) Notification of the Director (or his designee) Rule 410(3)(a)	<u> </u>	<u> </u>	<u> </u>	<u>I</u>
b.) If required, give notice to the National Response Center? Rule 410(3)(b), 40 CFR 171.15	<u> </u>	<u> </u>	<u> </u>	<u>I</u>
c.) If required, prepare a report in writing to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation Rule 410(3)(c), 40 CFR 171.16	<u> </u>	<u> </u>	<u> </u>	<u>I</u>
d.) Cleaned up any hazardous waste discharged that occurred and/or take appropriate action so that there is no longer a hazard to human health or the environment. Rule 410(5)	<u> </u>	<u> </u>	<u> </u>	<u>I</u>

Comments _____

10. Are all vehicles marked as required in Rule 406(6) including the following on both sides of vehicle.				
a.) The words "Hazardous Waste Hauling Vehicle" Rule 406(6)(a)	<u>✓</u>	<u> </u>	<u> </u>	<u>II</u>
b.) Company name, city and state Rule 406(6)(a)	<u>✓</u>	<u> </u>	<u> </u>	<u>II</u>
c.) Letters at least 5 centimeters (2 inches) Rule 406(6)(a)	<u>✓</u>	<u> </u>	<u> </u>	<u>II</u>
d.) Vehicle license Rule 406(7)	<u>✓</u>	<u> </u>	<u> </u>	<u>II</u>
e.) Current Act 64 decals Rule 406(6)(b)	<u>✓</u>	<u> </u>	<u> </u>	<u>II</u>

Comments _____

Form C
Transporter of Hazardous Waste

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Violation Class</u> |
|---|------------|-----------|------------|------------------------|
| 11. Has the required lettering and decals been removed on those vehicles no longer used to transport hazardous waste? | — | — | ✓ | <u>N/A</u> |
| 12. Identify the vehicles inspected at the facility, including those licensed under Act 64 of 1979 and Act 136 of 1969. | | | | |

Vehicle Name and ID No.	License Decal No.	Do these match the licenses?		Is decal(s) expired?		Licensed Under 64/136	
		<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>
1990 Freightliner	4625	✓	—	—	✓	✓	—
		—	—	—	—	—	—
		—	—	—	—	—	—
		—	—	—	—	—	—
		—	—	—	—	—	—
		—	—	—	—	—	—
		—	—	—	—	—	—

Comments _____

13. Describe the vehicle storage/parking and repair areas. Example: (Paved or gravel, location of drains, etc.). Include sketch of area.

Comments Vehicles are parked in indoor ramp
empty; or are held in a lot about 1/4 mile
away. Always stored empty.

RCRA AND DISPOSAL RESTRICTION INSPEC. IN

Facility: DETREX Chemical IndustriesU.S. EPA I.D. No. : MI 020906764Street: 312 ELLSWORTHCity: GRAND RAPIDS State: MI Zip: 49503Telephone: 454-9269 (616)

Owner/Operator:

Street: 4000 TOWNE CENTERCity: SOUTHFIELD State: MI Zip: 48075Telephone: 313-358-5800Inspection Date: 2 / 9 / 90 Time: 9:00 - 11:15Weather Conditions: CLOUDY, COOL

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>DALE DeKraker</u>	<u>MDNR</u>	<u>616-456-5871</u>

Facility Representative:	<u>SHARON BURNS</u>	<u>FACILITY Mgr</u>	<u>616-454-9269</u>
--------------------------	---------------------	---------------------	---------------------

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>
Dioxin	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
First Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Second Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

INSPECTION SUMMARY

Processes That Generate LDR Wastes

LDR wastes are generated by re-shipping F-solvents either to Detroit or to Ashtabula, Ohio. Detroit serves as a storage point between the generator and the ultimate recycle location.

LDR Waste Management

LDR wastes from various generators are stored at the Shand Rapids facility until a truck load is accumulated for shipment to Detroit or Ashtabula branch facilities. The Shand Rapids location has interstates and is thus allowed to hold wastes for more than 10 days.

Summary

Six drums of various F-series solvent LDR wastes were found to be stored beyond the 1 year limit specified in 40 CFR Part 268.50(b) of RCRA. Detroit could not prove that accumulation was needed to facilitate proper disposal. This violation will be issued. No other violations were noted.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List* F001, F002

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☐ No ☒ List* _____

d. First and Second Third Wastes

Yes ☐ No ☒ List* _____

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

☒ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
☒ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]? N/A

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No ___ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ___ No ___ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ☒ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☒ No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

Raw Chemical Data

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐

- TCLP Yes ☐ No ☒ NA ☐

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☒ No ☐ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

*Every new account and as requested to
confirm previous information*

- pH ≤ 2 Yes ☐ No ☐ NA ☒

List the wastes for which pH testing was used.

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ☐ Comments Storage only

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
F001	Detrom Corp.	Store / Recycle
F002	" "	" "

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No ☒ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No ☒ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

- | | | | |
|-------|--|----------|---------|
| (i) | EPA hazardous waste number | Yes ____ | No ____ |
| (ii) | Applicable prohibition
[268.33(f), 268.34(h)] | Yes ____ | No ____ |
| (iii) | Manifest number | Yes ____ | No ____ |
| (iv) | Waste analysis data,
if available | Yes ____ | No ____ |

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?
- Yes ____ No ____
- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?
- Yes ____ No ____
- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?
- Yes ____ No ____
- If yes, did the generator submit the documentation and certification prior to first shipment?
- Yes ____ No ____
- d. Does the demonstration contain the following information?

- | | | |
|--|----------|---------|
| A list of facilities and facility officials contacted? | Yes ____ | No ____ |
| Addresses | Yes ____ | No ____ |
| Telephone numbers | Yes ____ | No ____ |
| Contact dates | Yes ____ | No ____ |
| Certification statement | Yes ____ | No ____ |

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ___ No ___

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ___ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☒ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ☐ No ☐ Comments _____

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☐ Comments _____

If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent Yes ☒ No ☐ NA ☐
(TCLP)*Dioxin Yes ☐ No ☐ NA ☒
(TCLP)California List Yes ☐ No ☐ NA ☒
(PFLT and/or total constituent analysis)*First & Second Third Yes ☐ No ☐ NA ☒
(TCLP and/or total constituent analysis)* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ☒ No ☐ Comments G.C. Seano

- a. What date was the waste analysis plan last revised?

11/88

- b. Are analyses conducted on-site or off-site?

☒ On-site ☒ Off-siteIdentify off-site lab: Company's labs in Detroit
and Columbus, Ohio.

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ☐ No ☒ NA ☐

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs)).

Yes ☐ No ☐ NA ☒

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☐ No ☐ NA ☒

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments with manifests

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ☒ No ☐ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

☒ Tanks
☒ Containers
☐ Other (Identify inappropriate storage unit(s)). _____

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☒ No ☐ NA ☐

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes ☒ No ☐

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes ☒ No ☐ NA ☐

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ NA ☒

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes ☐ No ☐

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes ☐ No ☐ NA ☒

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes ☒ No ☐ NA ☐

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes ☐ No ☒ NA ☐

If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored: N/A

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes ☐ No ☐ NA ☐

- b. More than one year [268.50(f)]?

Yes ☐ No ☐ NA ☐

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days
[268.50(a)(3)]?

Yes ☒ No ☐

If yes, check the appropriate regulatory status:

☒ Interim status for storage
☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored
for more than 10 days:

- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ☐ No ☒

If yes, list the restricted wastes that have been mixed.

- C. Is the waste treated in an exempt treatment process on-site?

Yes ☐ No ☒

file
DETREX CORPORATION

P.O. Box 5111, Southfield, MI 48086-5111

TXW 810-224-4756

→ C+E File
Detrex Corp.
Grand Rapids, MI 49503
XC: Detrex
RECEIVED

FEB 12 1990

Waste Management
(313) 358-5800
Division

February 8, 1990

RECEIVED

Mr. W. A. Graves
Mid-Michigan Truck Services, Inc.
324 Ellsworth, S.W.
Grand Rapids, MI 49503

FEB 15 1990

WASTE MANAGEMENT DIVISION
GRAND RAPIDS

Dear Mr. Graves:

This will acknowledge receipt of your December 13, 1989 letter responding to my August 29, 1989 letter.

We have also had a very positive meeting in our Grand Rapids Gold Shield offices on Thursday, January 11, 1990. The results of this meeting are summarized below.

Detrex Corporation and Mid-Michigan Truck Services, Inc. have mutually agreed that:

1) Detrex Corporation will issue a check for \$3,304.60 to Mid-Michigan Truck Service, Inc. which is composed of \$2,054.60 for attempted but aborted tank installation, and \$1,100.00 for merger of two pumps to one feeder line, and \$150.00 for soil analysis. The above payment of \$3,304.60, along with the previous check of \$1,500 paid by Detrex (for the transportation and storage of the tank), adds up to a total payment by Detrex of \$4,804.60. Therefore, in fulfillment of this agreement, we are enclosing Detrex check No. 513660 dated February 7, 1990 for \$3,304.60.

2) The above settlement shall terminate and extinguish any and all alleged claims against Detrex Corporation by Mid-Michigan Services, Inc. other than Detrex's commitment to comply with DNR requirements.

As per our mutual agreement in the above meeting, Mid-Michigan Truck Services will return the tank and perform its piping and installation to a functional completion at their own expense, as soon as the investigation and remediation are completed.

The above payment was made by Detrex in the spirit of neighborly cooperation, and shall not be construed as an admission of guilt, culpability or liability by Detrex, its officers, directors, employees or agents.

I have also advised you that even with this settlement in hand I will respond to various points in your letter for clarification and for the record. These are summarized below as follows:

1) We were not able to locate a written easement for ingress and egress. However, even with the assumption that a verbal easement exists, it would be an easement for your surface use only and does not justify asking for rent on allegedly contaminated soil as indicated in your June 27, 1989 letter.

DETREX CORPORATION

Mr. W. A. Graves

- 2 -

February 8, 1990

2) The samples taken by Mid-Michigan and the DNR do not show petroleum hydrocarbon contamination because I believe the laboratory was not asked to check for petroleum hydrocarbons in the samples.

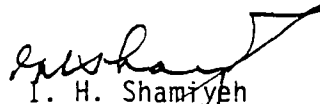
There is no question in my mind that there is petroleum hydrocarbon contamination in addition to the chlorinated solvent contamination. The CRA data demonstrates this. The degree of petroleum hydrocarbon contamination varies with the location.

3) As for your apprehension about CRA not testing your property, I would like to point out that the DNR request was to determine the extent of contamination (regardless of property boundaries). That is just exactly what CRA will pursue. They will continue coring southward until the full horizontal and vertical extent of soil and/or groundwater contamination have been identified. You have expressed a desire to have one or two points cored on your property. CRA has cored two points on your property (Borings 12 and 13). Nevertheless, if the DNR requires additional coring, and if DNR has no objection to bore an additional core on your property, we will do so.

4) In response to your statement that our company is fortunate to be allowed by DNR to do our own program and schedules, we would like to correct and clarify this concept. In all cases the DNR normal procedure is to request the company and/or its consultant to present a proposed investigation program and schedule for review by the DNR. The DNR can then either accept the proposal and schedule as is, or reject them as unsatisfactory and present comments requesting resubmission of a modified proposal incorporating the DNR comments by a specific deadline. Detrex follows this same procedure and is not prescribing its own remediation and following its own leisurely schedule as indicated by your letter.

In conclusion, I would like to thank you for your cooperation in the above referenced meeting which helped to resolve our problems. If you disagree with our agreement as stated in this letter, please notify me immediately. I will assume if you cash the enclosed check that you concur with my statement of our Agreement as set forth in this letter.

Very truly yours,


I. H. Shamiyeh
Risk Management Director

IHS/smb

cc: Michigan State Police
Michigan Department of Natural Resources